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General Counsel for Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re:

Chapter 11

THE LITIGATION PRACTICE GROUP,
P.C.,

Case No. 8:23-bk-10571-SC

Debtor.

**NOTICE OF HEARING ON JOINT
MOTION OF THE CHAPTER 11
TRUSTEE AND OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS FOR ENTRY OF AN
ORDER: (I) APPROVING PROPOSED
DISCLOSURE STATEMENT;
(II) APPROVING SOLICITATION AND
VOTING PROCEDURES;
(III) APPROVING NOTICE AND
OBJECTION PROCEDURES FOR
CONFIRMATION OF JOINT CHAPTER
11 PLAN OF LIQUIDATION;
(IV) SETTING RELATED DEADLINES;
AND (V) GRANTING RELATED RELIEF
THEREOF**

Hearing Date and Time

Date: May 15, 2024

Time: 1:30 p.m.

Place: *In Person or Via ZoomGov*
Courtroom 5C
411 West Fourth Street
Santa Ana, California 92701

1 **PLEASE TAKE NOTICE** that on May 15, 2024, at 1:30 p.m., the above-captioned Court
2 will hold a hearing in Courtroom 5C, located at 411 W. Fourth Street, Santa Ana, CA 92701, on the
3 *Joint Motion of the Chapter 11 Trustee and Official Committee of Unsecured Creditors for Entry of*
4 *an Order: (I) Approving Proposed Disclosure Statement; (II) Approving Solicitation and Voting*
5 *Procedures; (III) Approving Notice and Objection Procedures for Confirmation of Joint Chapter 11*
6 *Plan of Liquidation; (IV) Setting Related Deadlines; and (V) Granting Related Relief* (the “Motion”)¹
7 filed concurrently herewith by the Official Committee of Unsecured Creditors (the “Committee”) of
8 The Litigation Practice Group P.C. (the “Debtor”), in the above-referenced bankruptcy case (the
9 “Bankruptcy Case”) pending under chapter 11 of title 11 of the United States Code (the “Bankruptcy
10 Code”)² and Richard A. Marshack, in his capacity as the chapter 11 trustee of the Debtor (the
11 “Trustee” and, together with the Committee, the “Plan Proponents”).

12 **PLEASE TAKE FURTHER NOTICE** that, as set forth more fully in the Motion, the Plan
13 Proponents request entry of an order (the “Disclosure Statement Order”), substantially in the form to
14 be provided as a supplement to the Motion in advance of the objection deadline: (i) approving the
15 *Disclosure Statement Describing Joint Chapter 11 Plan of Liquidation (Dated May 22, 2024)* (the
16 “Disclosure Statement”) filed concurrently herewith; (ii) approving the solicitation and voting
17 procedures proposed in the Motion; (iii) approving the proposed notice and objection procedures for
18 confirmation of the *Joint Chapter 11 Plan of Liquidation (Dated May 22, 2024)*, as may be amended
19 (the “Plan”), filed concurrently herewith; (iv) establishing the Challenge Deadlines (as defined in the
20 Motion); and (v) granting related relief as set forth more fully in the Motion. The Motion is supported
21 by the *Declaration of Richard A. Marshack* appended to the Motion, the Plan, the Disclosure
22 Statement, any supplements to the foregoing filed before the hearing on the Motion, the record in this
23 Bankruptcy Case, the arguments of counsel at any hearing on the Motion, and any other admissible
24 evidence properly brought before the Court at or before the hearing on this Motion.

25 **PLEASE TAKE FURTHER NOTICE** that parties may view the Motion and related
26

27 ¹ Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Motion.
28 ² Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy Code.

1 documents for free through the case website maintained by Omni Agent Solutions, which can be
2 viewed at <https://omniagentsolutions.com/LPG>. Parties may also access copies of these documents
3 on the Court's docket for a charge through PACER, which can be accessed at www.cacb.uscourts.gov.

4 **PLEASE TAKE FURTHER NOTICE** that any party wishing to appear at the hearing
5 should review the Court's tentative ruling prior to the hearing, which will provide information on
6 whether in-person appearances are required and any remote access information for the hearing on the
7 Motion. **Parties are directed to obtain accessibility information on Judge Clarkson's posted**
8 **hearing calendar which may be viewed online at: [http://ecf-](http://ecf-ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC)**
9 **ciao.cacb.uscourts.gov/CiaoPosted/?jid=SC.**

10 **PLEASE TAKE FURTHER NOTICE** that, pursuant to LBR 3017-1(a), the hearing on the
11 Motion is set on 42 days' notice. Any party opposing or responding to the adequacy of the Disclosure
12 Statement or the Motion must file and serve the response ("Response"), pursuant to LBR 3017-1(b)
13 and 9013-1(f), on the Plan Proponents and the United States Trustee not later than 14 days before the
14 date designated for the hearing. A Response must be a complete written statement of all reasons in
15 opposition thereto or in support, declarations and copies of all evidence on which the responding party
16 intends to rely, and any responding memorandum of points and authorities.

17 **PLEASE TAKE FURTHER NOTICE** that, pursuant to LBR 9013-1(h), the failure to file
18 and serve a timely objection to the Motion may be deemed by the Court to be consent to the relief
19 requested therein.

20 DATED this 22nd day of March, 2024.

21 **FOX ROTHSCHILD LLP**

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